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Pensacola, Florida 32520

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BUREAU OF AIR REGULATION SOUTHERN COMPANY

May 29, 2002

R. Bruce Mitchell
Title V Section – Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

RE: SMITH ELECTRIC GENERATING PLANT
AUTHORIZATION TO CONDUCT CAM PROTOCOL TESTING
PERMIT No: 0050014-001-AV

0050014-004-AC

Gulf Power hereby requests authorization to conduct Compliance Assurance Monitoring (CAM) testing at Plant Smith for Units 1 & 2 during 2002. As you are aware, CAM is a requirement that must be addressed in the next round of Title V permit renewals for all facilities having pollution control equipment. In order to meet this goal, Gulf Power is planning a series of special particulate emission tests to calibrate a EPRI (Electric Power Research Institute) computer model to evaluate the performance of the Smith ESPs. Simply stated, this evaluation will require Gulf Power to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate emissions standard.

Therefore, Gulf Power requests a permit amendment to allow CAM protocol developmental testing on Smith Units 1 and 2 from September 1 through November 30, 2002 as needed to complete all tests and measurements. Authorization of these tests is consistent with the Department's power and duty under Section 403.061(18), Florida Statutes, to "[e]ncourage and conduct studies, investigations, and research relating to pollution and its causes, effects, prevention, abatement, and control."

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The specific equipment to be tested is the Smith Unit 1 & 2 electrostatic precipitators. The pollutants and or parameters measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature and other unit specific parameters that are needed for the computer model. Test methods to be utilized include EPA Method 9, EPA Method 17, CEM monitoring data (SO₂, NO_x, CO₂), and possible particulate size distribution.

Attached is an authorization statement by Robert G. Moore, the Responsible Official outlining his approval of this permit amendment request. Also attached is a statement by a professional engineer regarding the certification of the test protocol and schedule. Please note that we recently talked with the permitting staff at the Northwest Florida District office to outline this request, our test schedule and the basic CAM procedure. Ms. Sandra Veazey and her staff are being copied on this correspondence.

If you have any questions or need further information regarding the test procedures or CAM protocol development for Plant Smith please call me at (850) 444.6527.

Sincerely,



G. Dwain Waters, Q.E.P.
Air Quality Programs Supervisor

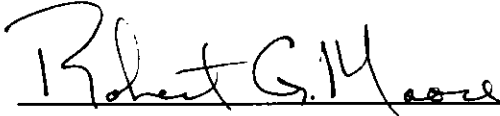
cc: w/att: Jim. Vick, Gulf Power Company
Mike Sarab, Gulf Power Company
Marie Largilliere, Gulf Power Company
Kevin Beaty, Gulf Power Company
Greg Terry, Gulf Power Company
Danny Herrin, Southern Company Services
Milan McGill, Southern Company Services
Clark Mitchell, Southern Company Services
Trey Hall, Gulf Power Company

Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida
Mr. Kevin White, FDEP Northwest District Office, Pensacola, Florida

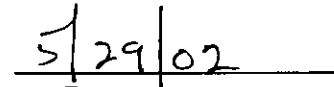
**CERTIFICATION BY RESPONSIBLE OFFICIAL
SMITH UNIT 1 & 2 COMPLIANCE ASSURANCE
MONITORING TEST PERMIT AMENDMENT REQUEST**

“I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Smith Electric Generating Plant for which this permit amendment is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this request are true, accurate and complete.”

Responsible Official Signature:



Robert G. Moore
Vice-President of Power Generation/Transmission

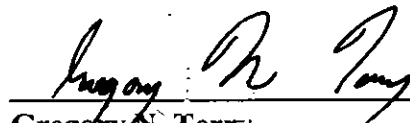


Date:

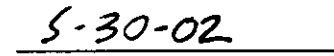
**SMITH UNIT 1 & 2 COMPLIANCE ASSURANCE
MONITORING TEST PROTOCOL AND SCHEDULE
CERTIFICATION BY PROFESSIONAL ENGINEER**

“I, the undersigned, am a registered professional engineer in the state of Florida and hereby certify to the best of my knowledge that all information submitted for this permit amendment to conduct special emissions testing for compliance assurance monitoring at the Smith Electric Generating Plant is true, accurate and complete.”

Professional Engineer Signature:



Gregory N. Terry
Registration Number: 52786



Date